

EXHIBIT A

1 LAURA VARTAIN HORN (SBN: 258485)
laura.vartain@kirkland.com

2 **KIRKLAND & ELLIS LLP**
555 California Street, 30th Floor
San Francisco, CA 94104
3 Telephone: (415) 439-1625

4 ALLISON M. BROWN (Pro Hac Vice admitted)
alli.brown@kirkland.com

5 **KIRKLAND & ELLIS LLP**
2005 Market Street, Suite 1000
Philadelphia, PA 19103
6 Telephone: (215) 268-5000

7 *Attorneys for Defendants*
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

8 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

11 This Document Relates to:
12 ALL ACTIONS

**DECLARATION OF DALENE BRAMER
IN SUPPORT OF DEFENDANTS' BRIEF
REGARDING SEPTEMBER 5 AND 8,
2025 CLAWBACKS PURSUANT TO
SPECIAL MASTER ORDER NO. 4, § III**

13 **DECLARATION OF DALENE BRAMER**

14 I, Dalene Bramer, having personal knowledge of the following state:

15 1. My current title is Senior Legal Director, Driver Policy, at Uber, a position I have
16 held since January 2020. I was first employed by Uber in May 2014 and have worked as in-house
17 counsel there for over eleven years. My previous roles include Chief of Staff to the Chief Legal
18 Officer; Legal Director, Employment; Senior Counsel, Employment; and Employment Counsel. In
my current role, as has been the case throughout my tenure at Uber, I am responsible for providing

DECLARATION OF DALENE BRAMER IN SUPPORT OF DEFENDANTS' BRIEF REGARDING SEPTEMBER 5
AND 8, 2025 CLAWBACKS PURSUANT TO SPECIAL MASTER ORDER NO. 4, § III

Case No. 3:23-MD-3084-CRB

1 legal advice to Uber's executive leadership team and various teams throughout the company
2 regarding litigation, product, policy and regulatory advice related to the classification of drivers who
3 use Uber's technology platform as independent contractors. I offer this Declaration in the
4 above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and
5 Rasier-CA, LLC's Brief Regarding September 5 and 8, 2025 Clawback Pursuant to Special Master
6 Order No. 4 § III (ECF 2933). The facts set forth herein are true and correct and are based on my
7 own personal knowledge, and I could and would competently testify thereto if called.

8 2. I am familiar with the document identified as JCCP_MDL_PRIVLOG110285, which
9 is a presentation deck outlining an initiative regarding the company's independent contractor model
10 for drivers who use the Uber platform. I was the designated leader of this project, and this deck was
11 created at my direction and with direct input by myself and other attorneys on the legal team,
12 including Seth Schreiber, then-Senior Product and Privacy Counsel; Jonathan Ollivent, Senior
13 Counsel, EMEA Employment; and Jenn Zhao, Director, Employment and Driver Policy, and by
14 Tommy Hofman, then-Product Manager. This project included a cross-functional team of product,
15 ops and legal individuals that were led and directed by me. The purpose of the project was to
16 enhance and strengthen the independent contractor model, educate the business on the model, and to
17 minimize litigation risks and legal exposure related to the independent contractor model for drivers
18 using the Uber platform.

3. Advising the company as to the legal and financial implications of the various driver
classifications in the U.S. and globally, particularly in light of employment law considerations, is an
essential aspect of my role at Uber. I and the legal team directed the creation of
JCCP_MDL_PRIVLOG110285 in anticipation of litigation and to mitigate legal risk related to
misclassification lawsuits. The purpose of the presentation was to inform the business as to product

changes that I recommended to bolster driver independence for purposes of strengthening our position in litigation and avoiding future litigation. All aspects and planning related to product creation and implementation were formed by me. This deck also provided attorney impressions from other countries related to independent contractor classification and was also intended to inform and advise the company about the critical legal implications that an employment model for drivers could have on Uber, including potential exposure in future litigation, product changes, and related regulatory and policy strategy. JCCP_MDL_PRIVLOG110285 accurately states that it is attorney-client privileged and created at the request of counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 25, 2025

By: Dalene Bramer

Dalene Bramer